EXHIBIT 1

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March 21, 2019

Anthony Irpino
Irpino, Avin Hawkins
2216 Magazine Street
New Orleans, LA 70130

      Re: *MDL 2804 – Privilege De-designations*

Dear Anthony,

      This letter supplements my correspondence of January 29 and February 18 and responds to your letters from March 14 and March 18.

      First, you ask that "Walgreens provide a status regarding production of documents" subject to Discovery Ruling No. 14, Part 4. As explained in my January 29 and February 18 correspondence and the cover letter accompanying WAGMDL032, Walgreens has produced the documents subject to Special Master Cohen's Discovery Ruling No. 14, Part 4 and its Amendment (D.I. 1387, 1395).

      Walgreens provides the following information regarding these documents – some of which is duplicative of information provided to you in prior correspondence.

Control Number	Beginning Bates	Production Volume
EM00004445	WAGMDL00774349	WAGMDL031
EM00013407	WAGMDL00778492	WAGMDL032
EM00013408	WAGMDL00778493	WAGMDL032
EM00013660	WAGMDL00778497	WAGMDL032
EM00013661	WAGMDL00778498	WAGMDL032
EM00014060	WAGMDL00710291	WAGMDL025
EM00030985	WAGMDL00710358	WAGMDL025
EM01473879	WAGMDL00778522	WAGMDL032

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EM02380934	WAGMDL00774723 WAGMDL00774724	WAGMDL031
EM02647546	WAGMDL00778537	WAGMDL032

Walgreens also provides the following information regarding other privilege de-designations contained in WAGMDL032:

Control Number	Beginning Bates	Production Volume
E00000186	WAGMDL00774773	WAGMDL032
E00000206	WAGMDL00774783	WAGMDL032
EM00013658	WAGMDL00778494	WAGMDL032
EM00013659	WAGMDL00778496	WAGMDL032
EM00137421	WAGMDL00778499	WAGMDL032
EM00402633	WAGMDL00778500	WAGMDL032
EM01025317	WAGMDL00778501	WAGMDL032
EM01025318	WAGMDL00778502	WAGMDL032
EM01025319	WAGMDL00778512	WAGMDL032
EM01473880	WAGMDL00778523	WAGMDL032
EM01943627	WAGMDL00778525	WAGMDL032
EM01943628	WAGMDL00778527	WAGMDL032
EM02647547	WAGMDL00778539	WAGMDL032
EM02647548	WAGMDL00778549	WAGMDL032
EM04240678	WAGMDL00778559	WAGMDL032
EM04240679	WAGMDL00778560	WAGMDL032
EM04263843	WAGMDL00778561	WAGMDL032

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EM04263844	WAGMDL00778562	WAGMDL032

Walgreens has also produced final documents related to the Suspicious Order Monitoring Program Policy and Procedures for the Pharmaceutical Integrity Team (*see, e.g.*, WAGMDL00245869 produced in WAGMDL0008) and DEA Suspicious Ordering – Phase 5a (*see, e.g.*, WAGMDL00774793, WAGMDL00774796, and WAGMDL00774799 produced in WAGMDL032).

Second, you provide additional challenges to Walgreens' privilege claims and note that you intend to provide "another round of sample challenges to Special Master Cohen for determination based on the remaining challenges." We are surprised by this statement. As you acknowledge in your March 14 letter, the parties have already engaged in extensive work to identify and downgrade documents including by engaging the Special Master where necessary. Walgreens also notes that for the majority of challenges Plaintiffs brought to the Special Master, the Special Master upheld Walgreens' position.

Many of the documents listed in your additional challenges are from privilege logs that have been in Plaintiffs' possession for several months and could have been addressed at an earlier time. You provide no reason why these privilege issues cannot have been resolved by this date, now two months after the fact discovery cut off. If there are specific issues you nevertheless insist need to be addressed that could not have been raised earlier, Walgreens remains open to that limited discussion.

Finally, as I have responded to separate Plaintiffs' counsel, Walgreens is still considering whether to take further steps with respect to Judge Polster's ruling on Amended Discovery Ruling No. 14, Part 1. If not, we anticipate producing the documents subject to this ruling early next week.

Thank you,

Sharon Desh